

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

IN THE MATTER OF:

**Barrett Paving Materials Inc.
3751 Commerce Drive
Middletown, Ohio 45005**

ATTENTION:

Jeff Payne

Request to Provide Information Pursuant to the Clean Air Act

The U.S. Environmental Protection Agency is requiring Barrett Paving Materials Inc. (Barrett or you) to submit certain information about the facility at 12220 Kirkwood Road, Sidney, Ohio. Appendix A provides the instructions needed to answer this information request, including instructions for electronic submissions. Appendix B specifies the information that you must submit. You must send this information to us within 30 calendar days after you receive this request.

We are issuing this information request under Section 114(a) of the Clean Air Act (the CAA), 42 U.S.C. § 7414(a). Section 114(a) authorizes the Administrator of EPA to require the submission of information. The Administrator has delegated this authority to the Director of the Air and Radiation Division, Region 5.

Barrett owns and operates an emission source at the Sidney, Ohio facility. We are requesting this information to determine whether your emission source is complying with the Ohio State Implementation Plan, 40 C.F.R. Part 60, Subpart I (Standards of Performance for Hot Mix Asphalt Facilities), 40 C.F.R. Part 60, Subpart A (General Provisions), and the CAA.

You must send all required information to:

Attn: Compliance Tracker, AE-17J
Air Enforcement and Compliance Assurance Branch
U.S. Environmental Protection Agency
Region 5
77 W. Jackson Boulevard
Chicago, Illinois 60604

You must submit all required information under an authorized signature with the following certification:

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 113(c)(2) of the Clean Air Act and 18 U.S.C. §§ 1001 and 1341.

As explained more fully in Appendix C, you may assert a claim of business confidentiality under 40 C.F.R. Part 2, Subpart B for any part of the information you submit to us. Information subject to a business confidentiality claim is available to the public only to the extent, and by means of the procedures, set forth at 40 C.F.R. Part 2, Subpart B. If you do not assert a business confidentiality claim when you submit the information, EPA may make this information available to the public without further notice. You should be aware, moreover, that pursuant to Section 114(c) of the CAA and 40 C.F.R. § 2.301(a) and (f), emissions data, standards and limitations are not entitled to confidential treatment and shall be made available to the public notwithstanding any assertion of a business confidentiality claim. Appendix C provides additional information regarding the meaning and scope of the term "emissions data."

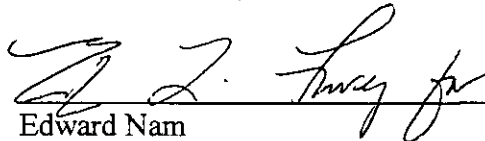
This information request is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 *et seq.*, because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

We may use any information submitted in response to this request in an administrative, civil or criminal action.

Failure to comply fully with this information request may subject Barrett to an enforcement action under Section 113 of the CAA, 42 U.S.C. § 7413.

You should direct any questions about this information request to David Sutlin at 312.353.8990.

3/14/17
Date


Edward Nam
Director
Air and Radiation Division

Appendix A

When providing the information requested in Appendix B, use the following instructions and definitions.

Instructions

1. Provide a separate narrative response to each question and subpart of a question set forth in Appendix B.
2. Precede each answer with the number of the question to which it corresponds and, at the end of each answer, identify the person(s) who provided information used or considered in responding to that question, as well as each person consulted in the preparation of that response.
3. Indicate on each document produced, or in some other reasonable manner, the number of the question to which it corresponds.
4. When a response is provided in the form of a number, specify the units of measure of the number in a precise manner.
5. Where information or documents necessary for a response are neither in your possession nor available to you, indicate in your response why the information or documents are not available or in your possession, and identify any source that either possesses or is likely to possess the documents or information.
6. If information not known or not available to you as of the date of submission later becomes known or available to you, you must supplement your response. Moreover, should you find at any time after the submission of your response that any portion of the submitted information is false or incorrect, you must notify EPA as soon as possible.

Electronic Submissions

To aid in our electronic recordkeeping efforts, we request that you provide all documents responsive to this information request in an electronic format according to paragraphs 1 through 6, below. These submissions are in lieu of hard copy.

1. Provide all responsive documents in Portable Document Format (PDF) or similar format, unless otherwise requested in specific questions. If the PDFs are scanned images, perform at least Optical Character Recognition (OCR) for "image over text" to allow the document to be searchable. Submitters providing secured PDFs should also provide unsecured versions for EPA use in repurposing text.
2. When specific questions request data in electronic spreadsheet form, provide the data and corresponding information in editable Excel or Lotus format, and not in image format. If Excel or Lotus formats are not available, then the format should allow for data to be used in calculations by a standard spreadsheet program such as Excel or Lotus.

3. Provide submission on physical media such as compact disk, flash drive or other similar item.
4. Provide a table of contents for each compact disk or flash drive containing electronic documents submitted in response to our request so that each document can be accurately identified in relation to your response to a specific question. *We recommend the use of electronic file folders organized by question number.* In addition, each compact disk or flash drive should be labeled appropriately (e.g., Company Name, Disk 1 of 4 for Information Request Response, Date of Response).
5. Documents claimed as confidential business information (CBI) must be submitted on separate disks/drives apart from the non-confidential information. This will facilitate appropriate records management and appropriate handling and protection of the CBI. Please follow the instructions in Appendix C for designating information as CBI.
6. Certify that the attached files have been scanned for viruses and indicate what program was used.

Definitions

All terms used in this information request have their ordinary meaning unless such terms are defined in the CAA, 42 U.S.C. §§ 7401 *et seq.*, 40 C.F.R. Part 60, Subpart I (Standards of Performance for Hot Mix Asphalt Facilities), 40 C.F.R. Part 60, Subpart A (General Provisions), or the Ohio State Implementation Plan.

Appendix B

Information You Are Required to Submit to EPA

Barrett Paving Materials Inc. (Barrett) must submit the following information pursuant to Section 114(a) of the CAA, 42 U.S.C. § 7414(a) within 30 days of receipt of this request:

1. For all asphalt production at the facility from January 1, 2012 through the date of receipt of this request, provide records of the following, for each day:
 - a. Average hot mix asphalt production rate in tons per hour;
 - b. Type of asphalt cement used;
 - c. Average asphalt cement rate in tons per hour;
 - d. Average reclaimed asphalt pavement (RAP) rate, in tons per hour;
 - e. Average percentage of RAP in the asphalt mix;
 - f. Average Kiln temperature; and
 - g. Average Temperature of baghouse stack.
2. From January 1, 2012 through the date of receipt of this request, provide records of the following, for each day, and for each silo at the facility:
 - a. Type of hot mix asphalt stored;
 - b. Average temperature of hot mix asphalt stored; and
 - c. Average storage time of hot mix asphalt, in hours.
3. Provide a diagram of each silo and conveyor at the facility, including the designation of each silo. Include also a narrative description of, and indicate on the diagrams, any vents, hatches, or points on the silos or conveyors that would allow emissions to exit into the atmosphere.
4. For each type of asphalt cement used by Barrett, identify the specific additives used in the manufacture of that cement (e.g., type of volatile substance used to make the asphalt cement softer and more workable), the quantities of each additive, and a narrative description of the type of application (e.g., base layer, surface layer, etc) for which that asphalt cement is used.
5. State whether Barrett has ever produced and/or used in its production process rubberized asphalt (e.g., asphalt pavement where crumb rubber from shredded tires is added or where crumb rubber has been added to the liquid asphalt cement). If Barrett has produced and/or used rubberized asphalt, provide the weekly production of rubberized asphalt from January 1, 2012 through the date of receipt of this request.
6. State whether Barrett has ever used conventional aggregate (non-slag) in the production of asphalt at the facility. If so, provide a list of all vendors that supplied conventional aggregate to the facility from January 1, 2012 to the receipt of this request. For each

vendor, include any records, documents, and/or certificates, which verify the volatile organic compound (VOC) content and the amounts (in tons) of the aggregate supplied by that vendor.

7. State whether Barrett has ever used slag aggregate in the production of asphalt. If so, provide, from January 1, 2012 to the receipt of this information request, the following:
 - a. The monthly slag aggregate throughput, in tons;
 - b. Slag usage as a percent of total aggregate, on a monthly basis;
 - c. List of all vendors that provided slag aggregate to the facility;
 - d. Original sources of raw slag (steel, blast furnace, etc.); and
 - e. State whether any crushing and screening of slag occurs at the facility.
8. Provide a list of all vendors that provided RAP to the facility from January 1, 2012 to the receipt of this request. For each vendor, provide the following information:
 - a. The name of each vendor;
 - b. The date range for which the vendor provided RAP to the facility;
 - c. The total tonnage of RAP provided by each vendor over the date range;
 - d. The contents, including additives, of the RAP provided from each vendor; and
 - e. Indicate whether the RAP contains slag, and if so, provide the percentage of slag in the RAP.
9. Provide the monthly records of the following information from January 1, 2012 to the receipt of this information request, as required pursuant to Permit Condition C.1.d(1) of Barrett's Permit-to-Install and Operate P0107638 (PTIO) issued by Ohio Environmental Protection Agency (OEPA) on February 17, 2011:
 - a. Hot-mix asphalt production, in tons;
 - b. The rolling, 12-month summation of asphalt production, in tons;
 - c. The rolling, 12-month summation of the PE, SO₂, NO_x, CO, and VOC emissions, in tons; and
 - d. The maximum percentage of RAP used for each mix type.
10. Provide all records related to the receipt, source, and chemical analysis of used oil as required pursuant to Permit Condition C.1.d(2) of Barrett's PTIO from January 1, 2012 to the receipt of this request.
11. Provide all records related to shipments of number 2 fuel oil, number 4 fuel oil, and on-spec used oil as required pursuant to Permit Condition C.1.d(3) of Barrett's PTIO from January 1, 2012 to the receipt of this request, including the total quantity of oil received and the analysis of sulfur content and heat content.
12. Provide copies of each and every burner evaluation and tuning report conducted on Emission Unit P901 (Kirkwood Drum #1571), as required pursuant to Permit Condition C.1.d(6) of Barrett's PTIO from January 1, 2012 to the receipt of this request. The burner

evaluation and tuning reports shall include at a minimum the recent stack test pollutant baseline level, the pre tuning, and the post tuning values for the following:

- a. Fuel flow to the burner (gallons/hr);
- b. Fuel pressure (psi);
- c. For burners that require compressed air for proper operation; pressure at the burner (psi);
- d. Carbon monoxide concentrations (ppm);
- e. Nitrogen oxide concentrations (ppm);
- f. Oxygen concentrations (percent); and
- g. Asphalt production (tons/hr).

13. Provide copies of all records discussing the daily visible emission checks for any visible particulate emissions from the stack and for any visible emissions of fugitive dust from the the rotary drum, hot mix asphalt elevator, and other areas serving the emission unit, as required pursuant to Permit Condition C.1.d(8) of Barrett's PTIO from January 1, 2012 to the receipt of this request. If visible particulate emissions were observed, provide the following additional information to the extent the information is not included in the records:

- a. The location and color of the emissions;
- b. Whether the emissions are representative of normal operations;
- c. If the emissions were not representative of normal operations, the cause of the abnormal emissions;
- d. The total duration of the visible emissions incident; and
- e. Any corrective action taken to minimize or eliminate the visible emissions.

14. Provide all records related to evaluations to determine if any emission unit changes still satisfy the "Air Toxic Policy," pursuant to Permit Conditions C.1.d)(10) and C.1.d)(11) of Barrett's PTIO from January 1, 2012 to the receipt of this request.

15. For Emission Unit P901 (Kirkwood Drum #1571), provide copies of the manufacturer's recommendations for operation and maintenance of the fuel burner.

16. Provide copies of all documentation relating to any stack testing, internal audits, emissions test runs, including partial runs, emissions characterizations, or emissions studies, conducted or attempted at the facility from January 1, 2012 to the receipt of this information request (i.e. stack tests, emission studies conducted on the plant or on specific production processes). Provide complete copies of test reports.

17. Provide the exact height in feet for the exhaust stack on the baghouse for Emission Unit P901 (Kirkwood Drum #1571). Also provide the height, length, and width of the plant silo.

18. From January 1, 2012 to the present, list all citizen complaints you received, either directly or forwarded to you from another entity, related to air emissions or odors at or from the facility. Provide all documentation you have about each complaint.

19. If you use a blue smoke control device at the facility, provide the following information concerning that device:
- a. The pressure drop range, in inches of water;
 - b. A narrative description of how the negative pressure is measured and verified;
 - c. The maximum and minimum operating temperature range;
 - d. A narrative description of how the temperature of the blue smoke control device is adjusted, set, and maintained by Barrett;
 - e. What is collected by the control device;
 - f. How is it disposed of;
 - g. A narrative description of maintenance performed on the blue smoke control device.
20. If you use a blue smoke control device at the facility, provide the hourly temperature readings of the blue smoke control device in degrees Fahrenheit from January 1, 2012 to the receipt of this request. For days when there is no temperature reading, indicate whether or not the asphalt plant was running and if hot mix asphalt was being produced.
21. Except for the four final air permits available through OEPA's online permit database (P0107638, P0107277, P0093111, PTI-08-04544), provide a copy of any additional final air permits under the Clean Air Act or the Ohio State Implementation Plan in effect for the facility at any time since January 1, 2012.

Appendix C

Confidential Business and Personal Privacy Information

Assertion Requirements

You may assert a business confidentiality claim covering any parts of the information requested in the attached Appendix B, as provided in 40 C.F.R. § 2.203(b).

Emission data provided under Section 114 of the CAA, 42 U.S.C. § 7414, is not entitled to confidential treatment under 40 C.F.R. Part 2.

“Emission data” means, with reference to any source of emissions of any substance into the air:

Information necessary to determine the identity, amount, frequency, concentration or other characteristics (to the extent related to air quality) of any emission which has been emitted by the source (or of any pollutant resulting from any emission by the source), or any combination of the foregoing;

Information necessary to determine the identity, amount, frequency, concentration or other characteristics (to the extent related to air quality) of the emissions which, under an applicable standard or limitation, the source was authorized to emit (including to the extent necessary for such purposes, a description of the manner and rate of operation of the source); and

A general description of the location and/or nature of the source to the extent necessary to identify the source and to distinguish it from other sources (including, to the extent necessary for such purposes, a description of the device, installation, or operation constituting the source).

40 C.F.R. § 2.301(a)(2)(i)(A), (B) and (C).

To make a confidentiality claim, submit the requested information and indicate that you are making a claim of confidentiality. Any document for which you make a claim of confidentiality should be marked by attaching a cover sheet stamped or typed with a caption or other suitable form of notice to indicate the intent to claim confidentiality. The stamped or typed caption or other suitable form of notice should employ language such as “trade secret” or “proprietary” or “company confidential” and indicate a date, if any, when the information should no longer be treated as confidential. Information covered by such a claim will be disclosed by EPA only to the extent permitted and by means of the procedures set forth at Section 114(c) of the CAA and 40 C.F.R. Part 2. Allegedly confidential portions of otherwise non-confidential documents should be clearly identified. EPA will construe the failure to furnish a confidentiality claim with your response to the information request as a waiver of that claim, and the information may be made available to the public without further notice to you.

Determining Whether the Information Is Entitled to Confidential Treatment

All confidentiality claims are subject to EPA verification and must be made in accordance with 40 C.F.R. § 2.208, which provides in part that you must satisfactorily show: that you have taken reasonable measures to protect the confidentiality of the information and that you intend to continue to do so, that the information is not and has not been reasonably obtainable by legitimate means without your consent and that disclosure of the information is likely to cause substantial harm to your business's competitive position.

Pursuant to 40 C.F.R. Part 2, Subpart B, EPA may at any time send you a letter asking that you support your confidential business information (CBI) claim. If you receive such a letter, you must respond within the number of days specified by EPA. Failure to submit your comments within that time would be regarded as a waiver of your confidentiality claim or claims, and EPA may release the information. If you receive such a letter, EPA will ask you to specify which portions of the information you consider confidential by page, paragraph and sentence. Any information not specifically identified as subject to a confidentiality claim may be disclosed to the requestor without further notice to you. For each item or class of information that you identify as being CBI, EPA will ask that you answer the following questions, giving as much detail as possible:

1. For what period of time do you request that the information be maintained as confidential, e.g., until a certain date, until the occurrence of a special event or permanently? If the occurrence of a specific event will eliminate the need for confidentiality, please specify that event.
2. Information submitted to EPA becomes stale over time. Why should the information you claim as confidential be protected for the time period specified in your answer to question number 1?
3. What measures have you taken to protect the information claimed as confidential? Have you disclosed the information to anyone other than a governmental body or someone who is bound by an agreement not to disclose the information further? If so, why should the information still be considered confidential?
4. Is the information contained in any publicly available databases, promotional publications, annual reports or articles? Is there any means by which a member of the public could obtain access to the information? Is the information of a kind that you would customarily not release to the public?
5. Has any governmental body made a determination as to confidentiality of the information? If so, please attach a copy of the determination.
6. For each category of information claimed as confidential, explain with specificity why release of the information is likely to cause substantial harm to your competitive position. Explain the specific nature of those harmful effects, why they should be viewed as

substantial and the causal relationship between disclosure and such harmful effects. How could your competitors make use of this information to your detriment?

7. Do you assert that the information is submitted on a voluntary or a mandatory basis? Please explain the reason for your assertion. If you assert that the information is voluntarily submitted information, explain whether and why disclosure of the information would tend to lessen the availability to EPA of similar information in the future.
8. Is there any other information you deem relevant to EPA's determination regarding your claim of business confidentiality?

If you receive a request for a substantiation letter from the EPA, you bear the burden of substantiating your confidentiality claim. Conclusory allegations will be given little or no weight in the determination. In substantiating your CBI claim(s), you must bracket all text so claimed and mark it "CBI." Information so designated will be disclosed by EPA only to the extent allowed by and by means of the procedures set forth in 40 C.F.R. Part 2, Subpart B. If you fail to claim the information as confidential, it may be made available to the public without further notice to you.

Personal Privacy Information

Please segregate any personnel, medical and similar files from your responses and include that information on a separate sheet(s) marked as "Personal Privacy Information." Disclosure of such information to the general public may constitute an invasion of privacy.

CERTIFICATE OF MAILING

I certify that I sent a Request to Provide Information Pursuant to the Clean Air Act by

Certified Mail, Return Receipt Requested, to:

Jeff Payne
Barrett Paving Materials Inc.
3751 Commerce Drive
Middletown, Ohio 45005

I also certify that I sent a copy of the Request to Provide Information Pursuant to the

Clean Air Act by E-mail to:

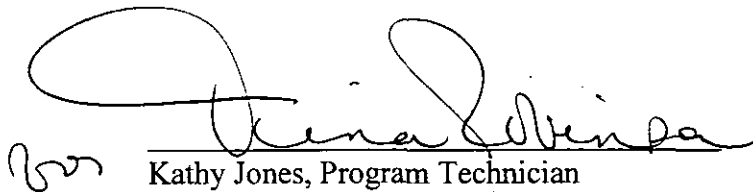
Bob Hodanbosi
Chief, Division of Air Pollution Control
Ohio Environmental Protection Agency
bob.hodanbosi@epa.ohio.gov

and

Jenny Marsee
Unit Supervisor
Regional Air Pollution Control Agency
marseejs@apca.org

Tom Schneider
APC Manager, Southwest District Office
Ohio Environmental Protection Agency
tom.schneider@epa.ohio.gov

On the 3rd day of March 2017.


Kathy Jones, Program Technician
AECAB, PAS

CERTIFIED MAIL RECEIPT NUMBER: 7014 2870 0001 9579 2862